



United States Department of the Interior

FISH AND WILDLIFE SERVICE
FISH AND WILDLIFE ENHANCEMENTColorado State Office
730 Simms Street, Suite 290
Golden, CO 80401

Phone (303) 231-5280

FTS 554-5280

FAX (303) 231-5285

FWE/CO
MAIL STOP 65412

February 14. 1992

Mr. Robert H. Birk
DOE/RFO Project Manager
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Mr. Martin Hestmark
Rocky Flats Project Manager, 8HWM-RI
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Gentlemen:

The U.S. Fish and Wildlife Service reviewed the document entitled, "Final Work Plan, RFI/RI Work Plan For OU 3, Rocky Flats Plant," U.S. Department of Energy (Energy), Rocky Flats Plant, Golden, Colorado, Environmental Restoration Program, December 6, 1991.

We find the subject document to be substantive and generally well-written with respect to the sections and areas that we reviewed pertaining to Service trust resources. Our specific comments on this document are enclosed. Our general comments are as follows:

The document states the intention of Energy to collect data under activities and tasks for the purpose of conducting an Environmental Evaluation (EE), particularly for those activities and tasks supporting Ecological Risk Assessment. The document further states the intent of Energy that data collected under these pursuits also be suitable for assessing injury to natural resources. Collecting data in a formal manner, consistent with the provisions of the Natural Resource Damage Assessment Regulations (NRDA), Type B Assessments, found at 43 CFR 11 provide the benefit of rebuttable presumption.



The Service refers Energy to a series of five Type B Technical Information Documents (TIDs) authored by the U.S. Department of Interior (Interior), CERCLA 301 Project, Washington, D.C. The series of five TIDs is comprised as follows:

1. Application Of Air Models To Natural Resource Injury Assessment, PB88-100128
2. Techniques To Measure Damages To Natural Resources, PB88-100136
3. Approaches To The Assessment of Injury To Soil Arising From Discharges of Hazardous Substances and Oil, PB88-100144
4. Guidance On Use Of Habitat Evaluation Procedures And Suitability Index Models For CERCLA Application, PB88-100151
5. Injury To Fish and Wildlife Species, PB88-100169

The Service encourages Energy to incorporate the concepts and approaches included in the listed TIDs as Data Quality Objectives (DQOs) for all sampling having the potential for consideration as EE/Ecological Risk Assessment data. We urge that concepts and methodologies contained in TID Item No. 5, "Injury To Fish and Wildlife Species," be implemented for data collection activities and tasks whose work products could conceivably be used in assessing ecological risk for Service trust resources. Additionally, we recommend special consideration be given to our specific comments on Section 8.2, Environmental Evaluation Tasks.

The Service wishes to emphasize the importance of coordinating issues, activities, and tasks associated with human health concerns with those of ecological concerns. The terms "environment" and "environmental" should be consistently and evenly applied in a formal ecological and natural resources context as well as for human health. Energy activities, tasks, and the documents describing them should strive to ensure that ecological issues and concerns within the Rocky Flats RFI/RI process receive a similar level of effort and consideration as human health issues; not only for OU3, but for all OUs associated with the site.

Robert Birk
Martin Hestmark


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Please contact John Wegrzyn at (303) 231-5280 if you have questions or require further information.

These general and specific comments to the subject document are provided only as technical assistance and do not constitute a position Interior may take in a subsequent Preliminary Natural Resource Survey regarding possible impacts/injury to natural resources.

The Service appreciates the opportunity to participate in the CERCLA RI/FS process for the Rocky Flats Plant.

Sincerely,



LeRoy W. Carlson
Colorado State Supervisor

JGW:

Enclosures

cc: ARD/FWS/FWE-Region 6
FWS/SLC
Colorado Division of Wildlife
Central Region (Attn: David Weber)
Colorado Department of Health
(Attn: Gary Baughman)

Reference: OU3-WP.WPF
FILE: Contam./Superfund/USDOE-RFP/OU3